



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Application for Approval of Pacific Gas and Electric Company's (U 39 E) Empower Electric Vehicle Charger Incentive and Education Program To Support Low and Moderate Income Customers

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Application No. 18-07-021

**CHARGEPOINT OPENING COMMENTS  
ON PROPOSED DECISION APPROVING THE APPLICATION OF PACIFIC GAS  
AND ELECTRIC COMPANY FOR THE EMPOWER ELECTRIC VEHICLE  
CHARGER INCENTIVE AND EDUCATION PROGRAM**

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## SUMMARY OF RECOMMENDATIONS

1. The Commission should approve the Proposed Decision’s recommendation to default participating customers onto a TOU rate, but ensure that every participating customer understands that it has an opportunity to opt out. PG&E should also offer every participating customer assistance in determining the optimal rate for their load profile.
2. If the Commission determines that EVSE submeters cannot be used by participating customers in this program, it should prioritize development of a submetering protocol in Rulemaking 18-12-006.

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In accordance with Rule 14.3(a) of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, ChargePoint, Inc. ("ChargePoint") submits comments on the Proposed Decision approving the Application of Pacific and Electric Company ("PG&E") for Approval of its Empower Electric Vehicle Charger Incentive and Education Program for Low and Moderate Income Customers ("Empower Program").

**I. Introduction**

The Proposed Decision approves PG&E's Empower Program, with minor changes to simplify and clarify the eligibility requirements, and resolve implementation issues. ChargePoint supports the Proposed Decision. PG&E has designed the program to take advantage of the expertise of community-based organizations and a third-party implementer with experience working with low- and medium-income communities.<sup>1</sup> This approach, with improvements adopted in the Proposed Decision, will enable effective outreach to target participants. PG&E has proposed to qualify up to three EVSE Packages that meet program requirements, and allow customers to choose from the list of qualified vendors and models.<sup>2</sup> These important program

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<sup>1</sup> Testimony, pp.10-14.

<sup>2</sup> Id. p.10.

design specifications will ensure that the program supports the SB 350 objectives of encouraging competition, private investment, and customer choice.

Questions of the program's approach to rates, and installer qualifications were raised by a number of parties. ChargePoint supports the Proposed Decision's resolution of these questions, while noting that this case offers a good example of why the Commission should prioritize addressing the use of EVSE submeters for billing in Rulemaking 18-12-006.

**II. The Proposed Decision correctly concludes that Empower Program customers should be offered all available rate options and assisted with selection of the optimal rate.**

The Proposed Decision concludes that:

[I]t is important to offer participating customers the flexibility to select the best rate plan for their needs and therefore declines to require participants to enroll in a TOU rate. Rather, the Commission deems it reasonable that participating customers are defaulted onto a TOU rate and have the opportunity to opt out if desired.<sup>3</sup>

ChargePoint supports this determination. While encouraging participation in time-of-use ("TOU") rates is essential, it is equally important to provide customers a choice of rates and assistance in choosing the best rate, because residential customers' load profiles vary. It would be counterproductive and damaging to the long-term objective of encouraging widespread expansion of transportation electrification if low- and medium-income program participants experience dramatic rate increases as a result of signing up for this program. PG&E and the third-party implementer should prioritize ensuring that every program participant receives direct assistance in analyzing their load profile and choosing between the default whole-house TOU and other available rates.

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<sup>3</sup> Proposed Decision p.11.

The Proposed Decision rejects the recommendation of a number of parties, including ChargePoint, that Empower Program participants be provided an option enabling the use of EVSE embedded submetering to lower the cost of participation in an EV-only TOU rate, concluding that EVSE submeters are “not an approved technology at this time” and that EVSE submetering “should be appropriately addressed in Rulemaking 18-12-006.”<sup>4</sup> ChargePoint does not oppose this instruction. However, it is disappointing that Empower Program participants will be deprived of the opportunity to use the submeters included with their Level 2 charging station to access EV TOU rates that could lower their electrical rates *and* serve the goal of encouraging charging off-peak and during afternoon hours when solar energy is abundant and inexpensive. The Commission should prioritize development of a submetering protocol in Rulemaking 18-12-006, and take steps now to ensure that utility billing system upgrades currently underway are coordinated with the objective of enabling use of EV submeters for billing and other purposes (e.g. demand response program participation) consistent with the Commission’s policy priorities.

**III. The Proposed Decision’s recommendation that a requirement to used licensed electricians to install home charging stations should be adopted.**

In considering the safety requirements for this program, the Proposed Decision concludes that:

The Commission finds it unnecessary to require the use of EVITP-certified electricians for purposes of this residential program and declines to adopt such a requirement. Given the scope of the technical requirements for the program, the Commission finds that a requirement to use licensed electricians [is] sufficient and consistent with Pub. Util. Code § 740.8.<sup>5</sup>

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<sup>4</sup> Id. p.12.

<sup>5</sup> Id. p.22. The word “as” in the second sentence quoted above should be changed to “is” (consistent with Finding of Fact 8).

The Proposed Decision further clarifies that a conforming change in the Safety Requirements Checklist adopted in Decision 18-05-040 should be made for purposes of implementing the Empower Program.<sup>6</sup> This conclusion is reasonable and consistent with the focus of the program on residential installations.

#### **IV. Conclusion**

ChargePoint supports adoption of the PG&E Empower Program and looks forward to its successful implementation.

Dated: August 29, 2019

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_

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<sup>6</sup> Id.

## APPENDIX A

### PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW

ChargePoint recommends the following modifications to the Findings of Fact and Conclusions of Law. The recommended modifications add clarifying language conforming to the text of the decision regarding participating customers' rate options, and explicitly instruct PG&E to assist participating customers in choosing an optimal rate for their household.

- Revise Conclusion of Law 5 as follows: Participants of the Empower program should be defaulted onto a TOU rate, and have the opportunity to opt out if desired. The whole-home EV TOU rate should be the default rate for Empower participants.
- Add the following additional Conclusion of Law and Ordering Paragraph: PG&E will offer every participating customer assistance in determining the optimal rate for their load profile.
- Revise Ordering Paragraph 6 as follows: Participants of the Empower program shall be defaulted onto a time-of-use rate, which shall be the whole-home electric vehicle time-of-use rate, but will have the opportunity to opt out if desired.